IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

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UNITED STATES OF AMERICA,	N.D. OF ALABAMA
Plaintiff,))
v.	CR00-S-422-S Superceding
ERIC ROBERT RUDOLPH,	
Defendant.)

Defendant's Initial Request for Disclosure

COMES NOW Eric Robert Rudolph, by and through counsel of record, hereby files this general request for discovery and inspection pursuant to Rule 16, Federal Rules of Criminal Procedure. This motion is filed so that the government will produce discovery as it has previously indicated and as stated in its "Discovery Notice" filed in this Court on October 31, 2003. The defendant hereby requests that the government:

- 1. Permit defendant to inspect and copy or photograph all statements of the defendant as provided in the Federal Rules of Criminal Procedure, Rule 16(a)(1)(A).
- 2. Furnish defendant with a copy of defendant's prior criminal record as provided in the Federal Rules of Criminal Procedure, Rule 16(a)(1)(B).
- 3. Permit defendant to inspect and copy or photograph all documents and tangible objects as provided in the Federal Rules of Criminal Procedure, Rule 16(a)(1)(C).
 - a. In this regard, defendant specifically requests that the government produce a complete copy of every book, pamphlet, or document which the government

intends to introduce into evidence or mention during either the guilt or

sentencing phase of trial.

4. Permit defendant to inspect and copy or photograph all results or reports of

examinations, tests, and experiments as provided in the Federal Rules of Criminal Procedure, Rule

16(a)(1)(D).

5. Provide defendant with all exculpatory or otherwise favorable information as

provided in Brady v. Maryland, 373 U.S. 83 (1963) and its progeny.

6. Furnish defendant with a copy of all statements of government witnesses as provided

in 18 U.S.C. 3500.

7. Defendant requests that the government comply with both the letter and the spirit of

Rule 16 as well as the constitutional requirements for the production and disclosure of exculpatory

and impeaching information.

8. This is Defendant's first motion for production. While it is general in nature,

it embraces all the requirements of Rule 16, and is made in an effort to expedite the discovery

process. Defendant respectfully requests that this Court will grant defendant leave to file an

additional and more specific motion(s) for discovery if and when the need arises. With these

conditions, Defendant respectfully prays that this Court will order the production of the foregoing

materials.

Respectfully submitted,

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ATTORNEYS FOR DEFENDANT ERIC ROBERT RUDOLPH

CERTIFICATE OF SERVICE

I hereby certify that on this the 3rd day of October 2003, a copy of the foregoing was served upon the following by hand delivery.

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Robert J. McLean
Will Chambers
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